

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Microsoft Petition for Rulemaking Seeking)	ET Docket No. 14-165
Amendment of Part 15 of the Commission's Rules)	
for Unlicensed Operations in the Television Bands,)	
Repurposed 600 MHz Guard Bands and Duplex)	
Gap, and Channel 37)	
)	

**Reply Comments of
Educational Theatre Association**

On behalf of the Educational Theatre Association (EdTA) and our more than 139,000 adult and student members across the country, we write to share our concerns about Microsoft Corporation's Petition for Rulemaking.¹

We want to acknowledge from the outset that EdTA is supportive of greater broadband connectivity in rural areas of the country. However, Microsoft's proposals would result in significantly elevated possibilities of interference to wireless microphones, cue and control devices, IFB, and assistive listening systems in use in theatres across the country.² The protections that Microsoft outlines in its Petition would only be of benefit to *licensed* wireless microphone users. There are important users of wireless microphones in rural areas that would


¹ Petition for Rulemaking of Microsoft Corporation, filed in ET Docket No. 14-165 on May 3, 2019.

² See Comments of Shure Incorporated in ET Docket No. 14-165 dated June 10, 2019.

be at risk by this proposal, and they are not licensed. A substantial number of our nearly 5,000 member schools are in rural communities and are not currently eligible for Part 74 licenses, even though the Commission has recognized that they provide similar services to the public as licensees and are eligible in every way other than the regular use of 50 or more microphones.³

Microsoft suggests increased power and mobility for White Space Devices that would not necessarily be limited to rural areas and provides that licensed wireless microphone users will be protected by the geo-location database. Our concerns are two-fold: we understand that the databases are not currently operational, and few, if any, school-based theatre programs – including those in rural areas – are not currently eligible for a Part 74 license. We urge the Commission not to move forward on Microsoft's proposals until (1) the White Space geolocation database is operational and effective and (2) the Commission has adopted its proposed rules to expand Part 74 licenses to worthy users.

Respectfully submitted

A handwritten signature in black ink, reading "Julie Cohen Theobald". The signature is written in a cursive, flowing style.

Executive Director
Educational Theatre Association

³ See Order on Reconsideration and Further Notice of Proposed Rulemaking in ET Docket No. 14-165, July 14 2017.